

AARON D. FORD
Attorney General
LESLIE A. HEALER (Bar No. 16710)
Deputy Attorney General
State of Nevada
Office of the Attorney General
100 N. Carson St.
Carson City, NV 89701
(775) 684-1203 (phone)
(775) 684-1108 (fax)
lhealer@ag.nv.gov
Attorneys for Respondent

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ROBERT GEOFFREY DAVIS,

Petitioner,

vs.

GABRIELA NAJERA, *et al.*,

Respondents

Case No.: 2:23-cv-01208-APG-MDC

**UNOPPOSED MOTION FOR
ENLARGEMENT OF TIME TO FILE
ANSWER TO SECOND AMENDED
PETITION (ECF NO. 22) (FIRST REQUEST)**

Respondents, by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada, hereby respectfully move this Court for an order granting a thirty-two (32) day enlargement of time, to and including June 3, 2025, in which to file and serve their answer to Davis' Second Amended Petition.

This motion is based upon the provisions of Rule 6(b) of the Federal Rules of Civil Procedure and the attached Declaration of Counsel, as well as all other papers, documents, records, pleadings and other materials on file herein.

This motion is made in good faith and not for the purpose of delay.

RESPECTFULLY SUBMITTED this 1st day of May, 2025.

AARON D. FORD
Attorney General

By: /s/ Leslie A. Healer
LESLIE A. HEALER (Bar No. 16710)
Deputy Attorney General

DECLARATION OF COUNSEL

STATE OF NEVADA)
 : ss.
 CARSON CITY)

I, LESLIE A. HEALER, hereby state, based on personal knowledge and/or information and belief, that the assertions of this declaration are true:

1. I am a Deputy Attorney General of the Post-Conviction Division of the Nevada Attorney General's Office, and I make this declaration on behalf of Respondents' motion for enlargement of time.

2. My answer in this matter is currently due on May 2, 2025. By this motion, I am requesting a thirty-two (32) day enlargement of time, to and including June 3, 2025, in which to file my answer. This is the first request for enlargement of time.

3. I require additional time to complete my response in this matter.

4. I recently filed a reply in *Sanchez-Rodriguez v. Breitenbach*, 3:24-cv-00032-ART-CSD, a response in *Cepero v. Williams*, 2:24-cv-01823-APG-MDC, reply in *Kirby v. Breitenbach*, 3:24-cv-00002-ART-CSD, a reply in *Supranovich v. Hutchings*, 2:21-cv-01269-RFB-BNW, responses in *Devose v. Hutchings*, 2:21-cv-02069-APG-DJA, and in *Hartzell v. Breitenbach*, 3:24-cv-00028-ART-CLB.

5. Furthermore, I have the following pending responses due, for which I must balance my time while working on this response: drafting an answer in *Fenton v. Baca*, 3:16-cv-00749-MMD-CLB.

6. Despite my other obligations, I have not neglected this case. However, I require additional time to finalize the response before filing.

7. I contacted counsel for the petitioner, and Ron Sung indicated that he has no objection to this request.

8. As such, this motion for enlargement of time is made in good faith and not for the purpose of unduly delaying the ultimate disposition of this case.

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1 Pursuant to 28 U.S.C. § 1746, Declarant herein certifies, under penalty of perjury, that the
2 foregoing is true and correct.

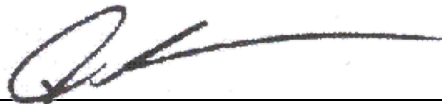
3 Dated this 1st day of May 2025.

4 By: /s/ Leslie A. Healer
LESLIE A. HEALER (Bar No. 16710)

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8 **ORDER**

9 IT IS SO ORDERED.

10 Dated this 2nd day of May, 2025.

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ANDREW P. GORDON
13 CHIEF U.S. DISTRICT JUDGE
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